UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re:

TS EMPLOYMENT, INC.,

No. 19-cv-8087-NSR

No. 15-bk-10243-MG

No. 18-ap-1649-MG

Debtors.

JAMES FELTMAN, not individually but solely as chapter 11 trustee for TS Employment, Inc.,

Plaintiff,

- against -

KOSSOFF & KOSSOFF LLP and IRWIN KOSSOFF,

Defendants.

STIPULATION AND ORDER

WHEREAS, Defendants have moved to withdraw the reference of the above-captioned adversary proceeding for purposes of trial;

WHEREAS, Plaintiff has represented in his Response that he does not oppose withdrawal of the reference upon completion of all pretrial proceedings; and

WHEREAS, the Case Management and Scheduling Order, entered September 10, 2019, set March 11, 2020 as the fact discovery cutoff, March 25, 2020 as the deadline to request a premotion conference pursuant to Local Bankruptcy Rule 7056-1, April 10, 2020 as the expert discovery cutoff, and June 2, 2010 at 10:00 a.m. as the date and time for the final pretrial conference.

NOW, THEREFORE, the parties hereby stipulate and agree as follows, by and through their undersigned counsel:

1. The motion to withdraw the reference of the adversary proceeding shall be held in

1	abeyance pending the completion of pretrial proceedings before the Bankruptcy Court.
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2. The parties shall submit a joint status report to this Court prior to the completion of pretrial proceedings in the adversary proceeding.

Dated: September 11, 2019

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- and -

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Attorneys for Plaintiff James Feltman, as

Chapter 11 Trustee

Dated: September 16, 2019

So ordered:

Honorable Nelson S. Román United States District Judge STORCH AMINI PC

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